

AO 91 (Rev 11/11) Criminal Complaint

United States District Court

for the
Southern District of Texas

United States of America
v.
Alma Teresa Ornelas-Gonzalez (USC / 1998)

Case No. M-25- 0201 -M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 27, 2025 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324(a)(1)(A)(ii)

Offense Description

Knowingly transport, or move, or attempted to transport aliens from a location in McAllen, Texas, to a location in McAllen, Texas, by means of a motor vehicle.

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet

Approved by AUSA D. Walker

/s/ Shakira Singho

Complainant's signature

Shakira Singho, Border Patrol Agent

Printed name and title

Submitted by reliable electronic means, sworn to and
attested telephonically per FED.R.CR.4.1, and probable
cause found on :

Date: January 28, 2025 at @ 9:12 p.m.


Judge's signature

City and State: McAllen, Texas

Juan F. Alanis, U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

I, Shakira Singho, am a United States Border Patrol Agent and have knowledge of the following facts:

1. On January 27, 2025, USBP Agents encountered a 1 on 1 alien smuggling case in McAllen, Texas.
2. At approximately 2:20 p.m., Border Patrol Intel Agents were conducting surveillance of a mall parking lot in McAllen, Texas, notorious for alien smuggling. Agents then observed a grey Ford Edge, that had been involved in previous smuggling events, arrive and deliver (1) male suspected undocumented alien to a black Dodge Journey.
3. Agents and Department of Public Safety Troopers continued to follow the Dodge to a warehouse parking lot in McAllen, Texas, where it parked. Agents and Troopers approached the vehicle to conduct a consensual encounter. The driver was identified as Alma Teresa Ornelas-Gonzalez. The passenger was identified as Marco Antonio Rojas-Castro and was recognized by Agents as the male that was transferred by the Ford to the Dodge. Both subjects were determined to illegally present in the United States (U.S.) and were taken to the Weslaco Border Patrol Station for processing.
4. Alma Teresa Ornelas-Gonzalez, a citizen and national of Mexico, provided a post-Miranda statement. Ornelas stated a friend asked if she could pick up his brother from an unknown person and transport him to a commercial location. Ornelas stated that during the smuggling attempt she received several calls from a middle-aged woman, coordinating the smuggling attempt.
5. Marco Antonio Rojas-Castro, a citizen and national of Mexico, provided a post-Miranda statement. Rojas stated his family made his smuggling arrangements but was unaware of how much they paid. Rojas said he crossed the Rio Grande River via raft and was taken to a residence. Rojas added he was then picked up by a woman driving an SUV. Rojas stated he was driven to a commercial location and instructed to board another SUV occupied by another female, under the promise he would be reunite with his family. Rojas further stated the female driver told him that he would be transported to another commercial location. He explained while waiting for his family members, he was apprehended by law enforcement. Rojas identified Alma Teresa Ornelas-Gonzalez, through a photo line-up, as the female that transported him prior to his apprehension.